



6. Plaintiff's counsel is also requesting leave to take the depositions of defendant's affiants Valerie Capers Workman (Franchise Administrator for Wyndham Hotels and Reports) and Emilo Gonzalez de Castilla del Valle. Both have submitted affidavits which are attached to the motion.

7. In the alternative, should this court not allow the plaintiff the right to conduct limited discovery, plaintiff is requesting an extension of the briefing schedule order giving plaintiff an additional twenty-one (21) days from April 29, 2008 until May 20, 2008 in order to retain an expert witness to appropriately respond to defendant's motion.

WHEREFORE, Plaintiff, DANUTA WOZNIAK, Individually and as Special Administrator of the ESTATE OF JAN WOZNIAK, deceased, respectfully requests that this court enter an order as follows:

- 1) Plaintiff has leave to issue written interrogatories concerning the franchise agreement between Wyndham Hotels and Resorts and Islander Properties;
- 2) Plaintiff has leave to depose defendant's affiants, Valerie Capers Workman and Emilo Gonzalez de Castilla del Valle;
- 3) In the alternative should this court not allow plaintiff to conduct limited written and oral discovery, extend the briefing schedule order to allow plaintiff's counsel an additional twenty-one (21) days from April 29, 2008 until May 20, 2008 to file a written response; and
- 4) Any further relief this court deems necessary or just.

Respectfully submitted,

(electronically signed)  
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